

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Goulding, Howard
Salamon, Robyn Goulding, and
John O'Shea

Plaintiffs,
v.

Mark Miller,

Defendant.

22 cv 05224

Honorable Sharon Johnson Coleman

MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE RESPONSE BRIEF

NOW COME the Plaintiffs, by and through their attorney, Fred R. Harbecke, and pray this Honorable Court for an additional extension of time to file their Brief in Response to Defendant's Motion to Dismiss, and in support thereof state as follows:

1. Defendant filed his Motion to Dismiss on February 7, 2023.
2. On February 8, 2023, this Court entered an order granting Plaintiffs to March 8, 2023 to file their responsive brief.
3. By motion filed on March 6, 2023 for an extension of time, this Court on March 7, 2023 granted a one week extension to March 15, 2023.
4. Defendant's Motion contained a list of facts that stand in opposition to facts alleged in the First Amended Complaint.
5. Plaintiffs believe they need to respond to certain of these facts by way of affidavit.
6. Although counsel has submitted an affidavit to his client, said client has not yet been able to review all of the facts, and to sign and have his affidavit notarized.

7. Counsel has been informed that he will have the affidavit by March 20, 2023 (in five days).

8. Plaintiffs' counsel has been diligently drafting the brief, but will be unable to complete it by that date, and will need an additional five days to have it completed and filed.

9. Plaintiffs' counsel has contacted Defendant's counsel, and has been told he objects.

WHEREFORE, Plaintiffs pray that the date for filing their response be extended, and for such other and further relief as this Honorable Court may deem just.

David Goulding, Howard Salamon, Robyn Goulding, and John O'Shea

/x/Fred R. Harbecke

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